

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA)	
Plaintiff,)	Case Number: 08 CR 235
)	
v.)	Judge: Joan B. Gottschall
)	
MISAEAL PADILLA GALVEZ)	
Defendant.)	

MOTION TO CONTINUE TRIAL DATE

NOW COMES, the Defendant, **MR. MISAEAL PADILLA-GALVEZ**, by and through his attorney, **GAL PISSETZKY**, respectfully moves this Honorable Court to continue the trial date. In support of his request, Mr. Padilla-Galvez. states as follows:

1. This Honorable Court set the trial date in this matter for September 15, 2008.
2. Mr. Padilla-Galvez and the government are currently in plea negotiations.
3. As part of the plea negotiation, the government recently turned over some additional discovery to Mr. Padilla-Galvez, and his attorney needs additional time to review it.
4. Moreover, based on the progress the parties have made towards a negotiated agreement, Mr. Padilla-Galvez strongly believes that this matter will be resolved short of trial.
5. The parties need additional time to complete their negotiations.
6. This request is not made to delay the matter, but to see that justice is done and to assure continuity of counsel.

WHEREFORE, Mr. Misael Padilla-Galvez respectfully request that this Honorable Court grant his motion and continue the trial date in this matter.

Respectfully submitted,

/s/ Gal Pissetzky
Gal Pissetzky
Attorney for Mr. Padilla-Galvez
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CERTIFICATE OF SERVICE

The undersigned, Gal Pissetzky, hereby certifies that in accordance with Fed.R.Crim.P. 49, Fed.R.Civ.P. 5, and the General Order on Electronic Case Filing (ECF), the

MOTION TO CONTINUE TRIAL

was served on August 5, 2008, pursuant to the district court's ECF filers to the following:

AUSA Nathalina A. Hudson
Assistant United States Attorney
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Respectfully submitted,

/s/ Gal Pissetzky
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